

1 WILLIAM A. ISAACSON (*Pro hac vice*)
(wisaacson@bsfllp.com)
2 STACEY K. GRIGSBY (*Pro hac vice*)
(sgrigsby@bsfllp.com)
3 NICHOLAS WIDNELL (*Pro hac vice*)
(nwidnell@bsfllp.com)
4 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
Washington, DC 20005
5 Tel: (202) 237-2727; Fax: (202) 237-6131

6 RICHARD J. POCKER #3568
(rpocker@bsfllp.com)
7 BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800
8 Las Vegas, Nevada 89101
Tel: (702) 382-7300; Fax: (702) 382-2755
9

10 DONALD J. CAMPBELL #1216
(djcc@campbellandwilliams.com)
11 J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
12 CAMPBELL & WILLIAMS
700 South 7th Street
Las Vegas, Nevada 89101
13 Tel: (702) 382-5222; Fax: (702) 382-0540

14 *Attorneys for Defendant Zuffa, LLC, d/b/a*
15 *Ultimate Fighting Championship and UFC*

16
17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25 Defendant.
26
27
28

No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF THE
PARTIES' JOINT MOTION TO
CONDITIONALLY FILE UNDER
SEAL EXHIBITS TO PLAINTIFFS'
RESPONSIVE BRIEFING RELATED
TO ZUFFA'S AND NON-PARTIES'
OBJECTIONS REGARDING
EXHIBIT LIST DOCUMENTS**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in
4 the law firm Boies Schiller Flexner LLP (“BSF”) and am counsel for Zuffa, LLC (“Zuffa”) in the
5 above captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*,
6 No. 2:15-cv-01045-RFP-BNW.

7 2. I make this declaration in support of Zuffa and Plaintiffs’ (together, the “Parties”) Joint Motion to Conditionally File Under Seal Exhibits to Plaintiffs’ Responsive Briefing Related to
8 Zuffa’s and Non-parties’ Objections Regarding Exhibit List Documents. Based on my personal
9 experience, knowledge, and review of the files, records, and communications in this case, I have
10 personal knowledge of the facts set forth in this Declaration and, if called to testify, could and would
11 testify competently to those facts under oath.
12

13 3. Exhibit A to this declaration is a true and correct copy of Plaintiffs’ Response to
14 Defendant Zuffa, LLC’s Objections to Plaintiffs’ Exhibit List Documents, ECF No. 674, filed June
15 28, 2019. Exhibit A contains fewer redactions than the public version filed by Plaintiffs on June 14,
16 2019.

17 4. Exhibit B to this declaration is a true and correct copy of Plaintiffs’ Opposition to
18 Defendant Zuffa, LLC’s Motion to Seal Exhibits and Protected Materials at the Evidentiary Hearing
19 on Class Certification, ECF No. 675, filed June 28, 2019. Exhibit B contains fewer redactions than
20 the public version filed by Plaintiffs on June 14, 2019.
21

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing facts are true and correct. Executed this 2nd day of July, 2019 in Washington, DC.
24

25 /s/ Stacey K. Grigsby
26 Stacey K. Grigsby
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